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FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

FEB 20 2014

SEAN F. McAVOY, CLERK
DEPUTY
SPOKANE, WASHINGTON

7 UNITED STATES DISTRICT COURT
8 EASTERN DISTRICT OF WASHINGTON

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 vs.

12 JANE DOE, using the name of
13 GUADALUPE ZAMUDIO,

14 Defendant.

Case No.: 2:14-CR-27-JLQ

INDICTMENT

Ct 1: 18 U.S.C. § 1029(a)(5) – Illegal
Transactions with an Access Device

Cts 2-10: 18 U.S.C. § 1028A –
Aggravated Identity Theft

Forfeiture Allegations

15 The Grand Jury charges:

16 **COUNT 1**

17 **Illegal Transactions with an Access Device**

18 From on or about June 7, 2013 to on or about June 24, 2013, in Grant County,
19 Washington, in the Eastern District of Washington, Defendant JANE DOE, using the
20 name of GUADALUPE ZAMUDIO, did knowingly and with intent to defraud, effect
21 transactions with an access device issued to another person to receive money
22 aggregating \$1,000 or more during a period from on or about June 7, 2013 to on or
23 about June 24, 2013, said use affecting interstate commerce and foreign commerce in

24 INDICTMENT - 1

25 02-19-14 Zamudio Indictment.docx

6	6/18/2013	Use and Possession of the means of identification of another person, to wit: bank debit card with account number XXXX XXXX XXXX 1490
7	6/21/2013	Use and Possession of the means of identification of another person, to wit: bank debit card with account number XXXX XXXX XXXX 1490
8	6/22/2013	Use and Possession of the means of identification of another person, to wit: bank debit card with account number XXXX XXXX XXXX 1490
9	6/23/2013	Use and Possession of the means of identification of another person, to wit: bank debit card with account number XXXX XXXX XXXX 1490
10	6/24/2013	Use and Possession of the means of identification of another person, to wit: bank debit card with account number XXXX XXXX XXXX 1490

all in violation of 18 U.S.C. § 1028A(a)(1).

NOTICE OF CRIMINAL FORFEITURE

Count 1 of this Indictment is hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. §§ 982(a)(2)(B) and 1029(c)(1)(C).

Upon conviction of the offense in violation of 18 U.S.C. § 1029(a)(5) set forth in Count 1 of this Indictment, Defendant JANE DOE, using the name of GUADALUPE ZAMUDIO, shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(2)(B), any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of such violation(s); and/or pursuant to 18 U.S.C. §

INDICTMENT - 3

that the access device utilized an automated teller machine connected to a nationwide network of financial institutions outside the Eastern District of Washington, all in violation of 18 U.S.C. § 1029(a)(5) and (c)(1)(A)(ii).

COUNTS 2-10

Aggravated Identity Theft

From on or about June 12, 2013 and continuing to on or about June 24, 2013, in Grant County, Washington, in the Eastern District of Washington, Defendant JANE DOE, using the name of GUADALUPE ZAMUDIO, did knowingly possess and use without lawful authority, a means of identification of another person during and in relation to the crime of Illegal Transactions with an Access Device as set forth in Count 1 of this Indictment:

<u>Count</u>	<u>Date</u>	<u>Aggravated Identity Theft</u>
2	6/12/2013	Use and Possession of the means of identification of another person, to wit: bank debit card with account number XXXX XXXX XXXX 1490
3	6/13/2013	Use and Possession of the means of identification of another person, to wit: bank debit card with account number XXXX XXXX XXXX 1490
4	6/14/2013	Use and Possession of the means of identification of another person, to wit: bank debit card with account number XXXX XXXX XXXX 1490
5	6/15/2013	Use and Possession of the means of identification of another person, to wit: bank debit card with account number XXXX XXXX XXXX 1490

1 1029(c)(1)(C), any personal property used or intended to be used to commit the
2 offense(s).

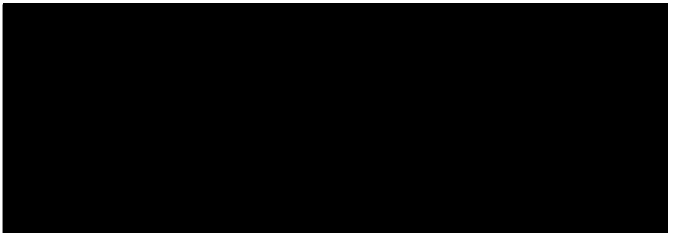
3 If any of the property described above, as a result of any act or omission of the
4 Defendant:

- 5 a. cannot be located upon the exercise of due diligence;
6 b. has been transferred or sold to, or deposited with, a third party;
7 c. has been placed beyond the jurisdiction of the court;
8 d. has been substantially diminished in value; or
9 e. has been commingled with other property which cannot be divided
10 without difficulty,

11 the United States of America shall be entitled to forfeiture of substitute property
12 pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1) and
13 § 1029(c)(2) and 28 U.S.C. § 2461(c).

14 DATED this 20th day of February 2014.

15
16 A TRUE BILL



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23 United States Attorney

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28 INDICTMENT - 4